

From: [Casey, Carolyn](#)
To: ["Clough, Steve"](#)
Cc: [St. Fleur, Marilyn](#); [Steinberg, Elliot](#)
Subject: RE: United Shoe South Parcel
Date: Thursday, May 01, 2014 1:18:34 PM

Thanks for such a prompt reply. We can review this further with the work plan when submitted and I will discuss with Dave as needed then. Could you please include this rationale in the work plan.

Thanks
Carolyn

Carolyn J. Casey
RCRA Facility Manager

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phone 617-918-1368
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From: Clough, Steve [<mailto:SClough@haleyaldrich.com>]
Sent: Thursday, May 01, 2014 1:13 PM
To: Casey, Carolyn
Cc: marilyn st fleur; Steinberg, Elliot
Subject: RE: United Shoe South Parcel

Hi Carolyn, thank you for your response, see below:

From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]
Sent: Thursday, May 01, 2014 12:53 PM
To: Clough, Steve
Cc: marilyn st fleur
Subject: RE: United Shoe South Parcel

I look forward to receiving the work plan. In the meantime, I did take a look at the figure and have the following questions/comments regarding the transects:

- There is an area between the boat yard transects and site transects where no sampling is proposed. Please clarify why. We did observe slag material in this area too.
We need to be able to try to discriminate between lead from the boat yard (e.g. red lead

used on boat hulls) and lead from the site. The “in between” area would most likely be a mix of both sites which would not provide meaningful information.

- It’s not clear why there are three samples on two of the transects and only 2 each on the other 7 transects.

We are trying to maintain a consistent spatial distribution of the sampling locations and, at the same time, keep the transects perpendicular to the shoreline.

- What is the reasoning for sample collection in front of the boat yard?

Per the first bullet, our client should not be responsible for lead emanating from any lead paint used to preserve boat hulls that may have subsequently migrated downgradient of the boat yard. Our previous report included a microscopic analysis that attributed much of the lead in the soil samples to “red lead”, which is indicative of a source other than slag at our site. The SOW will most likely include an option for microscopic geochemical analysis of samples that may be elevated in lead.

- The reference sample locations could be impacted from the site or other sources in the area. Perhaps there are more appropriate locations, further downstream (from the reference transects shown) and across the bay from the area of concern.

We chose these locations because concentrations in sediment should represent “local conditions” (this site is estuarine so the term “downstream” is not entirely accurate). We are also concerned about access over private property as one moves further to the south. We are open to discussion on this. Right now the most important aspect of the work scope is to ensure that we have enough samples that are representative of local/background conditions.

Thanks
Carolyn

Carolyn J. Casey
RCRA Facility Manager

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From: McDonald, David
Sent: Wednesday, April 30, 2014 7:30 AM
To: Clough, Steve
Cc: Casey, Carolyn

Subject: RE: United Shoe South Parcel

Hi Steve, unfortunately I have a number of things on my plate ahead of this. Please send this to the EPA RCRA project manager Carolyn Casey and she will determine where it falls in the priority list.

Thanks

Dave

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From: Clough, Steve [<mailto:SClough@halevaldrich.com>]

Sent: Tuesday, April 29, 2014 12:43 PM

To: McDonald, David

Cc: Steinberg, Elliot

Subject: United Shoe South Parcel

Hi Dave,

Our client is ready to move forward with investigation and we are in general agreement on what we discussed on our last call....but I'd like to talk with you to brainstorm an approach before I submit a Work Plan.

See attached PPT of tentative transects and sampling locations, I will give you a call soon. What is a good day and time?

Kind regards,

Steve

Stephen R. Clough, Ph.D., DABT
Lead Environmental Toxicologist

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